

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION**

H. Stuart Campbell, Jr.
Plaintiff,

v.

Texas Tea Reclamation, LLC, *et al.*
Defendants.

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No. 3:20-cv-00090

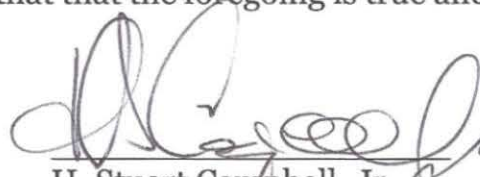
Declaration of H. Stuart Campbell, Jr.

1. My name is H. Stuart Campbell, Jr. I am the Executor of my father's estate, the Estate of H. Stuart Campbell, Sr. I declare under penalty of perjury that the following is true and correct. As Campbell, Sr.'s son and the Executor of my father's estate, I have personal knowledge of each of the matters stated in this Declaration.
2. Texas Tea Reclamation, LLC is an environmental company that was formed to remediate or reclaim hydrocarbon spills and waste. Later, Texas Tea shifted its focus to distributing a dust suppression product.
3. John "Jack" Williams III and his wife, Dymra Henderson Williams, are Texas Tea's managing members. Jack Williams is my father's nephew. In 2014, my father invested \$2 Million in Texas Tea. My father's capital account with Texas Tea reflected his substantial investment.
4. Later, on twenty-eight separate occasions from December of 2015 to August of 2018, my father loaned Texas Tea various amounts of money from \$25,000 to \$125,000. My father's loans totaled \$2.375 Million. True and correct copies of the wire transfer confirmations reflecting my father's transfer of the principal amounts to Texas Tea are attached to this Declaration as Exhibit A-1. Texas Tea memorialized my father's loans and Texas Tea's obligations to repay my father in twenty-eight promissory notes. True and correct copies of the promissory notes are attached to this Declaration as Exhibit A-2.
5. My father passed away on December 28, 2018.
6. On May 25, 2019, I (through North Carolina probate counsel) notified Texas Tea that my father passed away and asked Texas Tea to repay the notes and immediately settle Texas Tea's outstanding indebtedness owed to my

father's estate. A true and correct copy of my May 25, 2019 demand letter and proof of Texas Tea's receipt of that letter is attached to this Declaration as Exhibit A-3. In the letter, I also notified Texas Tea that I would pursue full payment of the notes. Texas Tea did not make any payment to me or the Estate after my May 2019 demand.

7. By the end of 2019, Texas Tea still had not repaid the promissory notes or the accrued interest. Therefore, on December 12, 2019, I (through North Carolina litigation counsel) made a second demand upon Texas Tea for full payment of the notes plus interest. A true and correct copy of my December 12, 2019 demand letter is attached to this Declaration as Exhibit A-4.
8. On December 12, 2019, Texas Tea (through Dymra Williams) sent my attorney and me an email stating that she was "in receipt of [my] demand letter" and that her attorney would contact us in the next thirty days. A true and correct copy of Texas Tea's December 12, 2019 email is attached to this Declaration as Exhibit A-6.
9. On January 9, 2020, Texas Tea sent me a formal letter "in response to [my] demand letter dated December 12, 2019." A true and correct copy of Texas Tea's January 9, 2020 letter is attached to this Declaration as Exhibit A-7. However, despite acknowledging receipt of my second demand letter twice, first in the email from Dymra Williams and second in the letter from Texas Tea, Texas Tea still did not make any payments on the notes.
10. Texas Tea continued to refuse to pay the amounts due on the notes, so I (through my Texas counsel) made a third demand for payment upon Texas Tea on May 11, 2020. A true and correct copy of my May 11, 2020 demand letter is attached to this Declaration as Exhibit A-5. Texas Tea did not respond to my third demand letter.
11. Texas Tea has not paid any money to me or the Estate as full or partial payment on the notes, accrued interest, or attorneys' fees and costs that I have incurred to enforce the notes.
12. I declare under penalty of perjury that that the foregoing is true and correct.

Executed on October 21, 2020.



H. Stuart Campbell, Jr.,
Executor of the Estate of
H. Stuart Campbell, Sr.